

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: ) Chapter 11  
          ) Case No. 01-01139-JKF  
W.R. GRACE & CO., et al., )  
          )  
          Debtors. )  
-----x

**VERIFIED STATEMENT AND NOTICE OF FILING THEREOF**  
**PURSUANT TO FED. BANKR. RULE 2019 FILED BY SIMMONSCOOPER LLC**  
**(EXHIBITS NOT SCANNED BUT ACCESSIBLE BY COURT ORDER)**

COMES NOW SimmonsCooper LLC (“SimmonsCooper”), a law firm representing certain individual personal injury claimants with claims against one or more of the Debtors, and hereby makes this Verified Statement (“Statement”) in compliance with Federal Rules of Bankruptcy Procedure 2019 and 9010. In support, SimmonsCooper states as follows:

1.       SimmonsCooper, a limited liability company, is organized under the laws of the State of Illinois, with its primary office for the practice of law located at 707 Berkshire Boulevard, East Alton, Illinois 62024. Robert W. Phillips, the declarant, is an attorney with SimmonsCooper and is licensed to practice law in the States of Missouri and Illinois.

2.       This Statement is filed in accordance with Rules 2019 and 9010 of the Federal Rules of Bankruptcy Procedure and pursuant to the *Revised Order Requiring Filing of Statements Pursuant to Fed. R. Bankr. P. 2019* dated October 22, 2004 (“Revised Order”).

3.       As of the date of this Statement, SimmonsCooper represents numerous individual personal injury claimants who claim to have been injured by asbestos products or materials manufactured, sold, installed, or serviced by one or more of the Debtors, or located on premises controlled by one or more of the Debtors (“Claimants”).

4.       Contemporaneously with the filing of this Statement, SimmonsCooper has submitted to the Clerk of the Court two sets of compact discs labeled “Set 1” and “Set 2” that

each include the information required by the Revised Order (“Discs”). Copies of the Discs have been served upon counsel for the Debtors and the Office of the United States Trustee. Exhibits have not been scanned but may be accessed by parties who obtain an Order of this Court authorizing access.

5. SimmonsCooper certifies that it is authorized to represent each of the Claimants in this case, and vote using a master ballot, under a written authorization to do so executed by each Claimant.

6. As required by the Revised Order, SimmonsCooper has copied onto the Discs an exemplar of the written document memorializing SimmonsCooper’s authorization to vote and represent the Claimants.

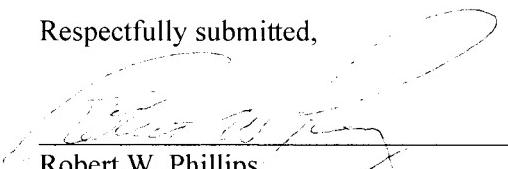
7. SimmonsCooper itself does not hold any “claims” against the Debtors, as such term is defined by 11 U.S.C. § 101(5).

8. The filing of this Statement does not constitute a waiver of any rights by Claimants, including the following: (i) rights to have final orders in non-core matters entered only after *de novo* review by a judge of the United States District Court; (ii) rights to trial by jury in any proceeding and on any trial on their claims; (iii) rights to have the reference withdrawn by the United States District Court; (iv) rights concerning the jurisdiction of the bankruptcy court over them or their claims; or (v) any other rights, claims, actions, defenses, setoffs, or right of recoupment to which the Claimants are or may be entitled to under any agreements, at law, or in equity, all of which are expressly reserved.

9. The information provided in this Statement is sworn under penalty of perjury pursuant to the requirements of 28 U.S.C. § 1746 by Robert W. Phillips, an attorney with SimmonsCooper.

Dated: December 1, 2005

Respectfully submitted,

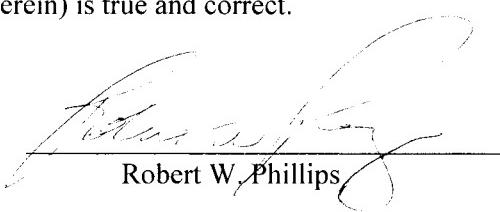
  
Robert W. Phillips  
SIMMONSCOOPER LLC  
707 Berkshire Boulevard  
East Alton, IL 62024  
Phone (618) 259-2222  
Fax (618) 259-2251  
[rphillips@simmonscooper.com](mailto:rphillips@simmonscooper.com)

Counsel for Claimants

**VERIFICATION PURSUANT TO 28 U.S.C. § 1746**

I declare under penalty of perjury that the foregoing (including the information attached hereto and incorporated by reference herein) is true and correct.

Executed on December 1, 2005

  
Robert W. Phillips